

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

IN RE: AUTOMOTIVE PARTS
ANTITRUST LITIGATION

:
: Master File No. 12-md-02311
:
: Case No. 12-cv-00102

PRODUCT(S):

AUTOMOTIVE WIRE HARNESES

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This Document Relates to:

ALL DEALERSHIP ACTIONS

: Hon. Marianne O. Battani
:
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**Dealership Plaintiffs' Motion for Preliminary Approval
of Proposed Settlement with Defendants Lear
Corporation and Kyungshin-Lear Sales and
Engineering, LLC and Provisional Certification
of a Settlement Class**

Dealership Plaintiffs hereby move the Court, pursuant to Rule 23(c) and (e) of the Federal Rules of Civil Procedure, for an Order in the form attached hereto:

(1) Preliminarily approving the proposed settlement of this litigation with Defendants Lear Corporation ("Lear") and Kyungshin-Lear Sales and Engineering, LLC ("KL Sales");

(2) Provisionally approving the proposed Settlement Class;

(3) Staying the proceedings against Lear and KL Sales in accordance with the terms of the Settlement Agreement;

(4) Authorizing Interim Co-Lead Class Counsel for Dealership Plaintiffs to provide notice of the Settlement Agreement to Settlement Class members, at a later date, in a form and manner to be approved in advance by this Court; and

(5) Appointing Interim Co-Lead Class Counsel for Dealership Plaintiffs as Settlement Class Counsel for purposes of this settlement.

In support of this Motion, Dealership Plaintiffs rely upon and incorporate by reference herein the facts and legal arguments set forth in the accompanying Memorandum of Law.

Lear and KL Sales consent to this motion and to the entry of the proposed order.

Dated: June 13, 2014

Respectfully submitted,

/s/Gerard V. Mantese

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